

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 18-CR-245(2)(DWF/HB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUSTIN MICHAEL DRECHSEL,

Defendant.

**GOVERNMENT'S
SUPPLEMENTAL SENTENCING
POSITION PLEADING**

COMES NOW the United States of America, by and through its undersigned attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and Allen A. Slaughter Jr., Assistant United States Attorney, and submits the following supplemental position on sentencing, with regard to a final disposition in the matter identified above. More specifically, this position pleading addresses an appropriate sentence for purposes of re-sentencing proceedings before this Court.

The modified PSR makes clear a 10-year mandatory statutory sentence applies – instead of a 15-year term. The PSR continues to recommend that a total offense level of 35 and criminal history category VI apply, resulting in an Advisory Guidelines recommended range of 292 to 365 months imprisonment. *See* Second Revised PSR, ¶ 137.

The government incorporates here the arguments made in its preliminary sentencing position pleading. *See* ECF 393. The circumstances of this case warrant a significant sentence. Such circumstances include Defendant's amalgamation of 49 criminal history points, including but not limited to multiple drug convictions. This history culminated with

his recent release from prison (for a drug conviction), only to begin large-scale methamphetamine distribution almost immediately. Therefore, the government respectfully once again submits that a term of at least 295 months imprisonment – the low end of the recommended Advisory Guidelines range – is the appropriate disposition here.

Dated: March 8, 2020

Respectfully,

ERICA H. MacDONALD
United States Attorney

s/ Allen Slaughter

BY: ALLEN A. SLAUGHTER JR.
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